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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CHRISTINE CONFORTI, et al.,

Plaintiffs,

vs.

CHRISTINE GIORDANO HANLON, in her  
official capacity as Monmouth County Clerk,  
et al.,

Defendants.

Case No.: 3:20-cv-08267-ZNQ-TJB

**ANSWER TO FIRST AMENDED  
COMPLAINT WITH AFFIRMATIVE  
DEFENSES**

Intervenor Defendant, Camden County Democrat Committee (“CCDC” or “Intervening Defendant”), hereby responds to Plaintiffs, Christine Conforti, Arati Kreibich, Mico Lucide, Kevin McMillan, Joseph Marchica, Zinovia Spezakis, and New Jersey Working Families’ (collectively, “Plaintiffs”), First Amended Complaint as follows:

**NATURE OF THE CASE**

1. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.
2. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, the allegations are denied.

3. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
4. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
5. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
6. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
7. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
8. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further

response, the referenced article speaks for itself. Any mischaracterization by Plaintiffs is denied.

9. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
10. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
11. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
12. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
13. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

#### **JURISDICTION AND VENUE**

14. Admitted in part and denied in part. Admitted only that Plaintiffs bring this action under 42 U.S.C. §§ 1983 and 1988. The remaining allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

15. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
16. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
17. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
18. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

**PARTIES**

**Plaintiffs**

Christine Conforti: Congressional Candidate in 2020 Primary and Future Democratic Candidate<sup>1</sup>

19. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
20. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is

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<sup>1</sup> All descriptive headings set forth throughout Plaintiffs' Amended Complaint are included herein for consistency with Plaintiffs' pleading and for purposes of reference only. Recitation of such headings is not and shall not be construed as an adoption or admission by the Intervening Defendant. The statements in the heading(s) are specifically denied.

without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly deny same.

21. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

22. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

23. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

Arati Kreibich: Congressional Candidate in 2020 Primary

24. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

25. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

26. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

27. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

Mico Lucide: Candidate for County Clerk in 2021 and Future Democratic Primaries

28. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

29. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

30. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

31. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is

without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

32. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

Joseph Marchica: County Committee Candidate in 2022 and 2022 Primaries

33. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

34. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

35. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

36. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

Kevin McMillan: Township Committee Candidate in 2020 and Potential Future Primaries

37. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
38. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
39. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
40. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
41. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
42. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is



without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

43. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

Zinovia Spezakis: Congressional Candidate in 2020 and 2022 Primaries

44. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
45. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
46. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
47. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

New Jersey Working Families Alliance, Inc.

48. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
49. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
50. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
51. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
52. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
53. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is

without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

54. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

55. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

56. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

#### **Defendants**

57. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

58. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

59. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
60. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
61. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
62. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
63. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
64. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
65. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

## STATEMENT OF FACTS AND LAW

### **A. Basic Ballot Layout**

66. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

67. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge of information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

68. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

### **B. Pivot Point**

69. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

70. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

71. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

72. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**C. Bracketing**

73. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any mischaracterization by Plaintiffs is denied.

74. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any mischaracterization by Plaintiffs is denied.

75. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any mischaracterization by Plaintiffs is denied.

**D. Ballot Position**

76. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any mischaracterization by Plaintiffs is denied.
77. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any mischaracterization by Plaintiffs is denied.
78. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any mischaracterization by Plaintiffs is denied.
79. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any mischaracterization by Plaintiffs is denied.
80. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
81. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

**E. United States Senate and Gubernatorial Candidates**

82. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied. By way of further response, the referenced statute speaks for itself. Any mischaracterization by Plaintiffs is denied.

83. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

84. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

85. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**F. Arbitrary Criteria for Ballot Advantage and Varying Standards of County Clerks**

86. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

87. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.



88. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

89. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**G. Position Bias/Primacy Effect and Other Poor Ballot Design Features**

90. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

91. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

92. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

93. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

94. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

95. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

96. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced report speaks for itself. Any mischaracterization by Plaintiffs is denied.

97. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

98. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

99. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

100. The allegations of this paragraph are not directed at Intervening Defendant and contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

**H. Conforti Ballot Draw/Ballot Placement**

101. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

102. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**a. Conforti's Monmouth County Ballot Draw and Ballot Placement**

103. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced document speaks for itself. Any mischaracterization by Plaintiffs is denied.

104. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

105. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

106. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

107. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

108. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**b. Conforti's Ocean County Ballot Draw and Ballot Placement**

109. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening

Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced document speaks for itself. Any mischaracterization by Plaintiffs is denied.

110. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

111. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

112. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

113. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**c. Conforti's Mercer County Ballot Draw and Ballot Placement**

114. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening

Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced document speaks for itself. Any mischaracterization by Plaintiffs is denied.

115. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

116. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

117. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**I. Kreibich Ballow Draw/Ballot Placement**

118. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

119. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening

Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

120. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced document speaks for itself. Any mischaracterization by Plaintiffs is denied.

121. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

122. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

123. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

124. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening

Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

125. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**J. Atlantic County Ballot Draw/Ballot Placement and Lucide's Upcoming Primary**

126. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

127. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced document speaks for itself. Any mischaracterization by Plaintiffs is denied.

128. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

129. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening



Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

130. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

131. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**K. Marchica Ballot Draw/Ballot Placement**

132. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

133. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

134. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further

response, the referenced document speaks for itself. Any mischaracterization by Plaintiffs is denied.

135. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

136. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

137. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

138. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

139. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

140. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

141. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**L. McMillian Ballot Draw/Ballot Position**

142. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

143. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

144. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced document speaks for itself. Any mischaracterization by Plaintiffs is denied.

145. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

146. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

147. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

148. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

149. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

150. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening

Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

151. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**M. Bergen and Hudson County Ballot Draws/Ballot Placement and Spezak's Upcoming Primary**

152. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

153. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**a. Bergen County Ballot Draw/Ballot Placement**

154. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced document speaks for itself. Any mischaracterization by Plaintiffs is denied.

155. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

156. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

157. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

158. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

159. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

160. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening

Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**b. Hudson County Ballot Draw/Ballot Placement**

161. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same. By way of further response, the referenced document speaks for itself. Any mischaracterization by Plaintiffs is denied.

162. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

163. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

164. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

165. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening

Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

166. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**N. NJWF**

167. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

**CLAIMS FOR RELIEF**

**COUNT I**

**U.S. Const. Amend. I and XVI, 42 U.S.C. § 1983**

**Violation of Plaintiffs' First and Fourteenth Amendment Rights Under Federal Constitution (Right to Vote/Vote Dilution)**

168. Intervening Defendant incorporates by reference the preceding paragraphs as if set forth fully herein.

169. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

170. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

171. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.



172. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
173. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
174. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
175. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
176. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
177. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
178. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
179. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
180. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
181. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
182. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

**WHEREFORE**, Intervening Defendant Camden County Democrat Committee hereby demands judgment dismissing Plaintiffs' Amended Complaint in its entirety and further awarding costs, attorneys' fees, and such other relief as deemed appropriate by the Court.

**COUNT II**  
**U.S. Const. Amend. I and XVI, 42 U.S.C. § 1983**  
**Violation of Plaintiffs' First and Fourteenth Amendment Rights Under Federal**  
**Constitution (Equal Protection)**

183. Intervening Defendant incorporates by reference the preceding paragraphs as if set forth fully herein.
184. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
185. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
186. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.
187. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
188. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.
189. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening

Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

190. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

191. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

192. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

193. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

194. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

**WHEREFORE**, Intervening Defendant Camden County Democrat Committee hereby demands judgment dismissing Plaintiffs' Amended Complaint in its entirety and further awarding costs, attorneys' fees, and such other relief as deemed appropriate by the Court.

**COUNT III**  
**U.S. Const. Amend. I and XVI, 42 U.S.C. § 1983**  
**Violation of Plaintiffs' First and Fourteenth Amendment Rights Under Federal**  
**Constitution (Freedom of Association)**

195. Intervening Defendant incorporates by reference the preceding paragraphs as if set forth fully herein.

196. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

197. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

198. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

199. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

200. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

201. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

202. The allegations of this paragraph are not directed at Intervening Defendant and, therefore, no response is required. To the extent a response is required, Intervening Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, accordingly, deny same.

203. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

204. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

205. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

206. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

207. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

208. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

**WHEREFORE**, Intervening Defendant Camden County Democrat Committee hereby demands judgment dismissing Plaintiffs' Amended Complaint in its entirety and further awarding costs, attorneys' fees, and such other relief as deemed appropriate by the Court.

**COUNT IV**  
**U.S. Const. Art. I, § 4, cl. 1, 42 U.S.C § 1983**  
**Violation of Elections Clause Under Federal Constitution**

209. Intervening Defendant incorporates by reference the preceding paragraphs as if set forth fully herein.

210. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

211. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

212. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

213. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

214. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

215. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

216. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

217. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

218. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

219. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

220. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

221. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

**WHEREFORE**, Intervening Defendant Camden County Democrat Committee hereby demands judgment dismissing Plaintiffs' Amended Complaint in its entirety and further awarding costs, attorneys' fees, and such other relief as deemed appropriate by the Court.

**COUNT V**  
**42 U.S.C. § 1983**  
**Violation of Civil Rights Act**

222. Intervening Defendant incorporates by reference the preceding paragraphs as if set forth fully herein.

223. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

224. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

225. The allegations of this paragraph contain conclusions of law to which no response is required. To the extent a response is required, the allegations are denied.

**WHEREFORE**, Intervening Defendant Camden County Democrat Committee hereby demands judgment dismissing Plaintiffs' Amended Complaint in its entirety and further awarding costs, attorneys' fees, and such other relief as deemed appropriate by the Court.

**SEPARATE AND AFFIRMATIVE DEFENSES**

1. Plaintiffs fail to state a claim upon which relief can be granted.
2. Plaintiffs' claims are barred by the doctrines of laches, estoppel, fraud, unclean hands, and/or waiver.
3. Plaintiffs' claims are barred by the statute(s) of limitations and/or failure to exhaust administrative remedies.
4. Plaintiffs have not been deprived of any right, privilege, or immunity secured to them by the United States Constitution or any Act of Congress.
5. This Court lacks subject matter jurisdiction over some or all of the claims alleged herein.

6. Plaintiffs' claims are barred by res judicata, and/or collateral estoppel, and/or the entire controversy doctrine.

7. Plaintiffs' claims fail because Plaintiff cannot demonstrate that Intervening Defendant had the requisite intent for the claims they allege.

8. Plaintiffs suffered no damages and/or any damages suffered by Plaintiffs were a result of either Plaintiffs' own actions or the actions of third parties over whom Intervening Defendant has no control.

9. Plaintiffs have failed to mitigate their damages, if any.

10. Subject to proof through discovery, Plaintiffs' alleged damage claims are barred in whole or in part by the after-acquired evidence doctrine.

11. Plaintiffs have unreasonably failed to mitigate their alleged damages.

12. The damages requested by Plaintiffs are not recoverable, in whole or in part, as a matter of law.

13. Plaintiffs fail to state a claim for punitive damages.

14. Plaintiffs are not entitled to equitable relief as a matter of law.

15. Plaintiffs are not entitled to attorneys' fees or costs.

16. At all relevant times, Intervening Defendant acted in compliance with all applicable laws, rules, regulations, and standards.

17. Intervening Defendants at all times acted within the scope of their statutory powers and discretion.

18. Plaintiffs have failed to join indispensable, necessary, and proper parties.



19. Intervening Defendant reserves the right to supplement these Affirmative Defenses upon the completion of discovery.

**BROWN & CONNERY, LLP**  
Attorneys for Intervenor, Camden County  
Democrat Committee

Dated: April 24, 2023

BY: s/ William M. Tambussi  
William M. Tambussi, Esquire  
Alyssa I. Lott, Esquire

**RESERVATION OF RIGHTS**

Intervening Defendant hereby reserves the right prior to, at, or after trial to interpose any additional objections and/or further defenses as continuing investigation may disclose.

**BROWN & CONNERY, LLP**  
Attorneys for Intervenor, Camden County  
Democrat Committee

Dated: April 24, 2023

BY: s/ William M. Tambussi  
William M. Tambussi, Esquire  
Alyssa I. Lott, Esquire

**JURY TRIAL DEMAND**

Intervening Defendant hereby demands a trial by jury in the above-captioned matter on all claims.

**BROWN & CONNERY, LLP**  
Attorneys for Intervenor, Camden County  
Democrat Committee

Dated: April 24, 2023

BY: s/ William M. Tambussi  
William M. Tambussi, Esquire  
Alyssa I. Lott, Esquire

**DESIGNATION OF TRIAL COUNSEL**

William M. Tambussi, Esquire is hereby designated as trial counsel for Intervening Defendant in the above-captioned matter on all claims.

**BROWN & CONNERY, LLP**  
Attorneys for Intervenor, Camden County  
Democrat Committee

Dated: April 24, 2023

BY: s/ William M. Tambussi  
William M. Tambussi, Esquire  
Alyssa I. Lott, Esquire

**CERTIFICATION PURSUANT TO LOCAL RULE 11.2**

I hereby certify that the matter in controversy in this action is not the subject of any other action pending or contemplated in any court, or of any pending or contemplated arbitration or administrative proceeding. I further certify that there are no additional known parties who should be joined in the present action at this time.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

**BROWN & CONNERY, LLP**  
Attorneys for Intervenor, Camden County  
Democrat Committee

Dated: April 24, 2023

BY: s/ William M. Tambussi  
William M. Tambussi, Esquire  
Alyssa I. Lott, Esquire